



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

JUL 02 2014

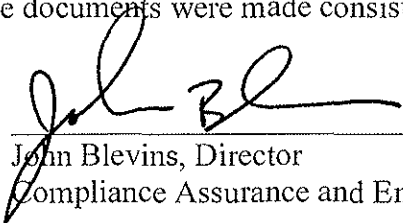
CERTIFICATE
ACCOMPANYING COPIES
OF AGENCY RECORDS

40 C.F.R. Section 2.406
[F.R. Civ.P. Rule 44]
[28 U.S.C. Section 1733]

AUTHENTICATION

I am the Division Director, Compliance Assurance and Enforcement Division, Region 6, United States Environmental Protection Agency, Dallas, Texas. In that position, I am the legal custodian, under the Regional Administrator, of those official records of the United States Environmental Protection Agency which are in the custody of Water Enforcement Branch and the Compliance Assurance and Enforcement Division. I attest that 30 pages of documents to which this Authentication is attached are true and correct copies of official records which are in the custody of the Water Enforcement Branch and Compliance Assurance and Enforcement Division of Region 6 of the United States Environmental Protection Agency in Dallas, Texas. The official records from which these documents were made consist of information related to Creed Operating Facility Co., LLC.

7.2.14
Date


John Blevins, Director
Compliance Assurance and Enforcement Division

CERTIFICATE

I am the Regional Counsel of the Region 6 office of the United States Environmental Protection Agency in Dallas, Texas. I have official duties within that office in Dallas, Texas, where the official records described above are kept. I certify that John Blevins, the person who signed the above Authentication, is the Division Director, Region 6 of the United States Environmental Protection Agency in Dallas, Texas, and that in such position, he has the legal custody, under the authority of the Regional Administrator, of the official Agency records described above. I certify that the signature of John Blevins above is genuine.

Witness my signature and the official seal of the United States Environmental Protection Agency.

7-2-14
Date


Suzanne B. Murray
Regional Counsel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

January 18, 2013

CERTIFIED MAIL – RETURN RECEIPT REQUESTED: 7007 3020 0002 5102 8232

Mr. Matt Muehlberger
Creed Operating Company, LLC
705 8th Street, Suite 400
Wichita Falls, TX 76301

Re: Cease and Desist Administrative Order, Docket Number: CWA-06-2013-1724
Facility Number: TXU010971

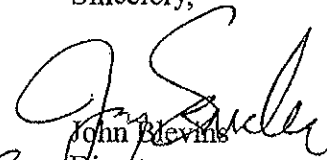
Dear Mr. Muehlberger:

Enclosed is an Administrative Order (AO) issued to Creed Operating Company, LLC, for violation of the Clean Water Act (CWA) (33 U.S.C. § 1251 *et seq.*). The violation was identified during a November 29, 2012 inspection, conducted by the Environmental Protection Agency (EPA), of your facility known as the Novice Unit Lease, designated as Facility Number TXU010971. The violation alleged is for the unauthorized discharge of a pollutant, specifically oil field brine and produced wastewater, to waters of the United States.

Effective upon receipt of this AO, you shall immediately cease and desist all discharges of pollutants into the identified tributaries of Jim Ned Creek, and comply with all provisions set forth in the enclosed AO. This AO also requires responses to certain information demands. The EPA is committed to ensuring compliance with the requirements of the CWA, and my staff will assist you in any way possible.

If you have any questions, please contact Dr. Jack Arias, of my staff, at (214) 665-8164.

Sincerely,


John Blevins
Director
Compliance Assurance and
Enforcement Division

Enclosure

cc: Ms. Susan Johnson (MC 169)
Manager, Enforcement Section I
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

U.S. ENVIRONMENTAL PROTECTION AGENCY - REGION 6
FINDINGS OF VIOLATION, COMPLIANCE ORDER, AND INFORMATION DEMAND
In the Matter of Creed Operating Company, LLC (Respondent)
Docket No. CWA-06-2013-1724

STATUTORY AUTHORITY

The following findings are made and Order issued under the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA"), by Sections 308 and 309(a) of the Clean Water Act ("the Act"), 33 U.S.C. §§ 1318 and 1319(a). The Administrator delegated the authority to issue this Order to the Regional Administrator of EPA Region 6 who further delegated such authority to the Director of the Compliance Assurance and Enforcement Division.

FINDINGS

1. Respondent, Creed Operating Company, LLC, is a "person," as defined by Section 502(5) of the Act, 33 U.S.C. § 1362(5).

2. At all times relevant to the violation alleged herein ("relevant time period"), Respondent operated an oil field production facility known as the Novice Unit Lease located in Coleman County, Texas ("facility"), designated as Facility Number TXU010971.

3. On November 29, 2012, an EPA inspector observed that pollutants, specifically oil field brine and produced wastewater, recently generated from oil production activities, had been discharged from the facility to "waters of the United States," as that term is defined by 40 C.F.R. § 122.2. Pollutants were discharged to a tributary of Jim Ned Creek. The inspector determined that the water located at the discharge point of entry (N32 0.9264' W99 38.4457') connected to the S and SE tributaries (N32°00'36", W99°38'26" and N32 0.0106' W99 38.1425') of Jim Ned Creek and was contaminated with brine discharges and measured between 1,100 and 15,100 parts-per-million total soluble salts.

4. Pumps, pipes, hoses, flow lines, production wells, and associated devices located at the facility acted as "point sources," as defined by Section 502(14) of the Act, 33 U.S.C. § 1362(14).

5. At no time during the relevant time period did Respondent have National Pollutant Discharge Elimination System permit coverage under the Act which authorized the discharge of a pollutant from the facility to waters of the United States.

6. During the relevant time period, it was unlawful under Section 301(a) of the Act, 33 U.S.C. § 1311(a), for any person to discharge a pollutant from a point source to waters of the United States without a permit issued under Section 402 of the Act, 33 U.S.C. § 1342.

7. On or before November 29, 2012, Respondent discharged or caused the discharge of pollutants from point sources within the facility to waters of the United States without permit coverage under the Act, in violation of Section 301(a) of the Act, 33 U.S.C. § 1311(a).

SECTION 309(a)(3) COMPLIANCE ORDER

Based on these findings and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. § 1319(a)(3), EPA orders that Respondent take the following actions immediately upon receipt of this Order:

- a. Cease all discharges of pollutants from the facility;
- b. remove all brine from the flow path located in between the facility and the identified S and SE tributaries of Jim Ned Creek; and
- c. remove all brine from Jim Ned Creek, located at Latitude 32 0.9264' North and Longitude 99 38.4457' West, which was discharged from the facility on or about November 29, 2012.

SECTION 308 INFORMATION DEMAND

Based on the foregoing Findings and pursuant to the authority of Section 308 of the Act, 33 U.S.C. § 1318, Respondent is required to do the following:

- a. Within thirty (30) days of the effective date of this Order, Respondent shall provide written certification to EPA Region 6 that these activities have been completed.

GENERAL PROVISIONS

Respondent may seek federal judicial review of the Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706. Section 706, which is set forth at <http://uscode.house.gov/download/pls/05C7.txt>, states the scope of such review.

Issuance of this Section 309(a)(3) Compliance Order and the Section 308 Information Demand shall not be deemed an election by EPA to waive any administrative, judicial, civil, or criminal action to seek penalties, fines, or other relief under the Act for the violation alleged herein or other violations which may become known to EPA. EPA reserves the right to seek any remedy available under the law which it deems appropriate.

Compliance with this Order does not relieve Respondent of its obligation to comply with all applicable federal, state, and local laws.

JAN 18 2013

Date _____

John Blevins
Director
Compliance Assurance and
Enforcement Division

INSPECTION REPORT

REPORT DATE: 11/20/2012

INCIDENT NO: 11292012-1

INSPECTION DATE: 11/29/2012

INVESTIGATOR: Jack Arias and Dale Selgrath

LOCATION: RRC 10904 Novice Field Coleman County, Texas

COUNTY: Coleman

OWNER/OPERATOR: Creed Operating Company, LLC
705 8th Street STE 400
Wichita Falls, TX 76301

SURFACE OWNER: Taylor, Charles Jr.

PHONE: 940-453-4389

EMERGENCY HOTLINE NOTIFIED: No

POINT SOURCE: Tanks batteries

LATITUDE/LONGITUDE: N32 0.6136' W99°3739' (Tank 1), N32 0.4050' W99 38.3411' (Tank 2), N32 0.1242' W99 38. 3206" (Tank 3), N31 59.9691' W99 38.0109 (Tank 4)

RECEIVING WATER: TRIBUTARY OF THE JIM NED CREEK

LATITUDE/LONGITUDE: N32 0.9264' W99 38.4457'

INSPECTION OBSERVATIONS:

An inspection was conducted on 11-29-12. Found two large ponds South (S) and Southeast (SE) of Jim Ned Creek contaminated with brine discharges (upstream of Jim Ned Creek), TSS in ponds were approximately 5700 and 3,500 ppm (see aerial and topographic maps for detail information). Also found upstream of Ned Creek pools of fluids (different locations) contaminated with brine discharges between 2,700 and 15100 ppm TSS (see maps). The inspectors determined that the water located at the discharge point of entry (N32 0.9264' W99 38.4457') connected to the S and SE tributaries (N32°00'36", W99°38'26" and N32 0.0106' W99 38.1425') of the Jim Ned Creek was contaminated with brine discharges and measured between 1100 and 15100 parts-per-million total soluble salts. Observed pumps and tank leaks, missing berms around tanks, staining from leaks on tanks, corroded tanks, saltwater crystal formations, flow paths of fluids discharging into south and southeast tributaries, and dead vegetation along the flow paths located in between the facility tanks and the identified S and SE tributaries of Jim Ned Creek. S and SE Tributaries runs north towards Jim Ned Creek (See aerial and topographic map for details). TSS measurements showed a direct correlation of contamination (source to water of the US) going from high concentration (15100 ppm TSS up gradient facility tanks) to low concentration (1100 ppm TSS low gradient point of entry Jim Ned Creek). Operator need to take appropriate actions to remediate the affected areas to background levels.

SUPPORTING VIDEO, PICTURES, OR SAMPLES: Report, Photos, and RRC information.

OTHER AGENCIES OR PARTIES CONTACTED OR INVOLVED: NONE

REGIONAL COMMENTS/INFORMATION OBTAINED:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

1445 Ross Avenue, Suite 1200
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Creed Operating Facility Co., LLC

Inspectors: Jack Arias & Dale Selgrath

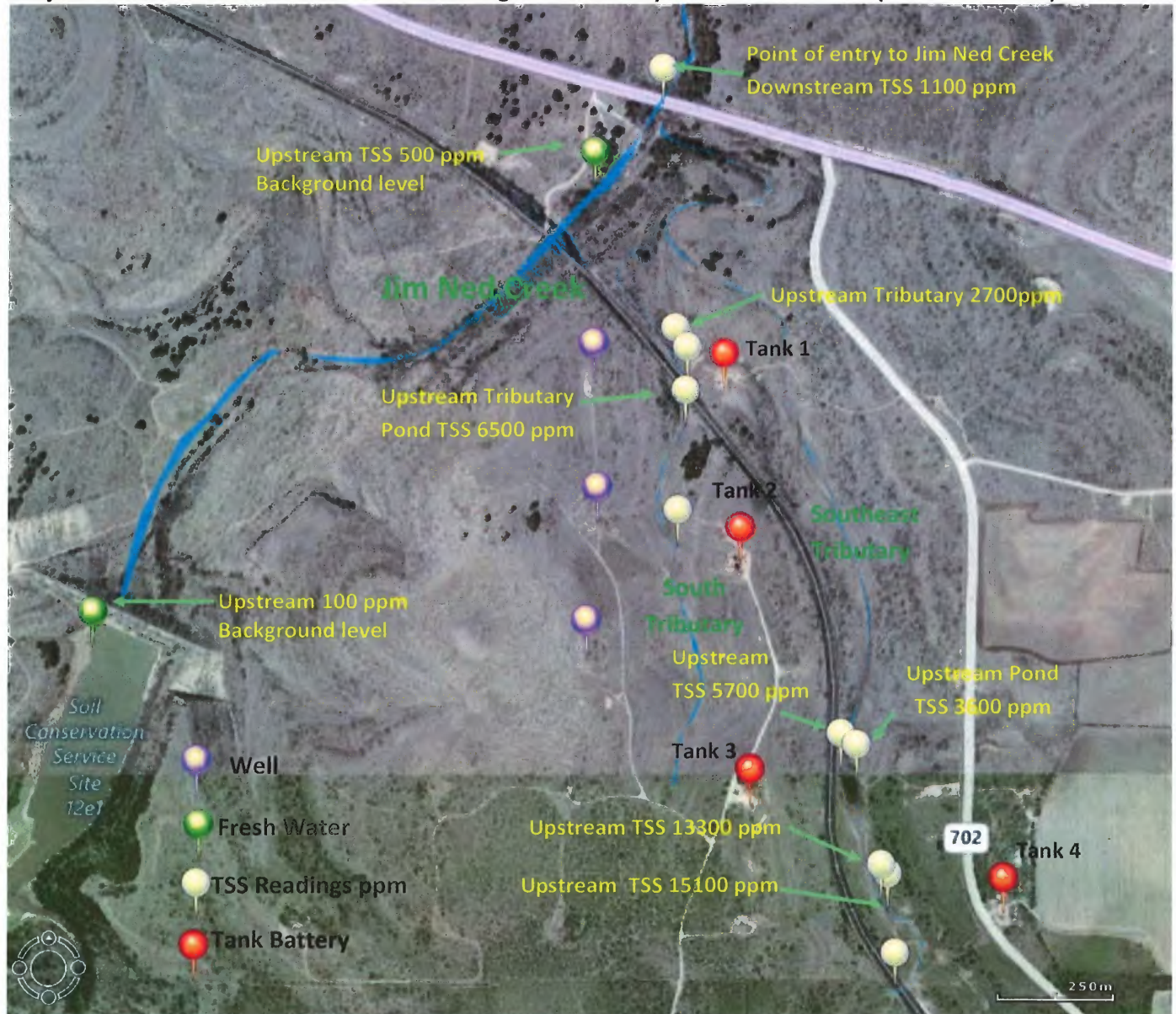
Date: 11-29-12

Time: 8:00 am

City/County/State: Coleman County, Texas

Location (coordinates): N32 0.9264' W99°4457'

Subject: Novice Unit Lease RRC 10904 Discharges to tributary and Jim Ned Creek (Point of Entries)



Aerial photo of Creed Operating facility showing brine discharges to tributaries and Jim Ned Creek. Facility needs to take appropriate actions to remediate the affected areas to background levels. Remove all brine from the flow path located in between the facility and the identified S and SE tributaries of Jim Ned Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Creed Operating Facility Co., LLC

Inspectors: Jack Arias & Dale Selgrath

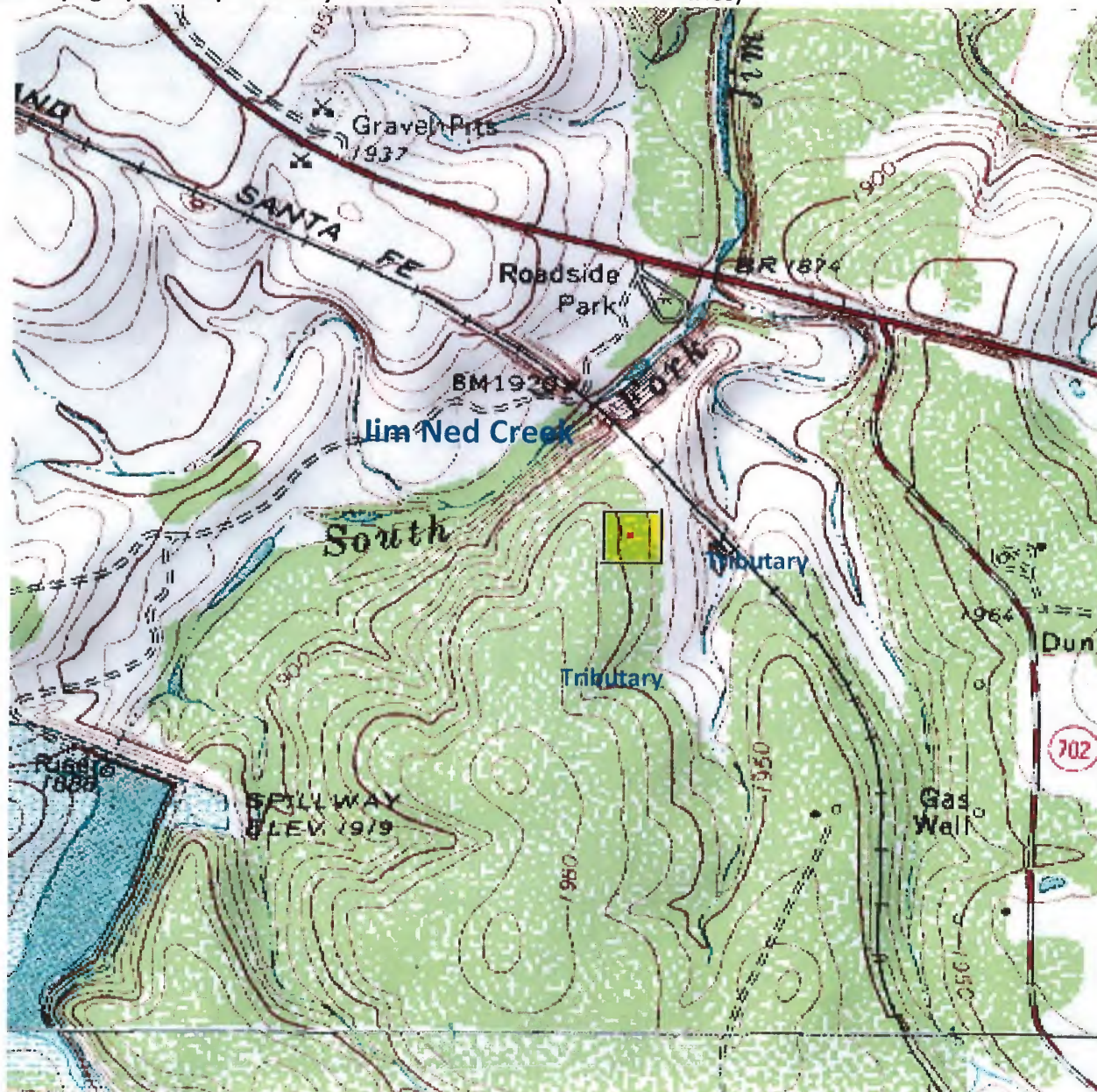
Date: 11-29-12

Time: 8:00 am

City/County/State: Coleman County, Texas

Location (coordinates): N32 0.9264' W99°4457'

Subject: Topographic Map tributary and Jim Ned Creek (Point of Entries)



Topographic Map of Creed facility showing tributaries and Jim Ned Creek. Unnamed tributaries run North towards Jim Ned Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

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Creed Operating Facility Co., LLC Photo 1

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 8:30 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.6136' W99°3739'		
Subject: Novice Unit Well #8024 (upstream to Ned Creek) (tank 1)		



Photo #1. Facing south from point of entry to Need Creek. Observed an injection well and abandoned storage tanks parts. Apparently tank was removed, but not clean up was completed. Observed a discharge flow path going towards to tributary and eventually to Ned Creek.




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Creed Operating Facility Co., LLC Photo 2

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 8:50 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.6363' W99°38.3371'		
Subject: Discharge flow path part 1 (upstream to Ned Creek)		
		
<p>Photo #2. . Facing south east from point of entry to Need Creek. Observed a flow path coming from the injection and tank site. Discharge flow got into the tributary and eventually to Ned Creek. Observed salt crystal on soil and dead vegetation along the path.</p>		



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Creed Operating Facility Co., LLC Photo 3

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 9:00 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.6489' W99°38.3614'		
Subject: Discharge flow path part 2 (upstream to Ned Creek)		



Photo #2. . Facing south east from point of entry to Need Creek. Observed salt crystals on soil and dead vegetation along the path. Discharge went from tributary to Ned creek.



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Creed Operating Facility Co., LLC Photo 4

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 9:10 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.6306' W99°38.4161'		
Subject: Discharge flow path part 3 (upstream to Ned Creek)		
		
<p>Photo #2. . Facing south east from point of entry to Need Creek. Dead vegetation and a clear discharge flow path getting into tributary and Ned Creek.</p>		



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Creed Operating Facility Co., LLC Photo 5

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 9:30 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.6810' W99°38.4288'		
Subject: Discharge flow path part 4 (upstream to Ned Creek)		



Photo #2. . Facing south east from point of entry to Need Creek. Flow path linking to tributary and eventually to Ned Creek.



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Creed Operating Facility Co., LLC Photo 6

Inspectors: Jack Arias & Dale Selgrath	Date: 11-29-12	Time: 9:50 am
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City/County/State: Coleman County, Texas
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Location (coordinates): N32 0.6086' W99°38.4126'
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Subject: TSS Measurement of fluids in tributary (upstream to Ned Creek)



Photo #6. Facing south east from point of entry to Need Creek. TSS measurement of standing fluids was 2700 ppm TSS. Observed shiny oil sheens, some oil residues, and small formations of salt crystals.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Creed Operating Facility Co., LLC Photo 7

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 10:00 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.6086' W99°38.4126'		
Subject: Flow Path of discharge (upstream to Ned Creek)		



Photo #7. . Facing south east from point of entry to Need Creek. Observed small formations of salt crystals, flow paths of discharges, and flow paths were connected to a pond (north of flow path) that was contaminated with produce water (6500 ppm).



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Creed Operating Facility Co., LLC Photo 8

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 10:10 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32°00'36", W99°38'26"		
Subject: Pond showing high concentration of salt in water (upstream Ned Creek)		



Photo #8. Facing south east from point of entry to Need Creek. TSS measurement of standing fluids was 5700 ppm TSS. Did not observe microorganism in pond water. Pond is connected to the tributary upstream and downstream.



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Creed Operating Facility Co., LLC Photo 9

Inspectors: Jack Arias & Dale Selgrath	Date: 11-29-12	Time: 10:30 am
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City/County/State: Coleman County, Texas
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Location (coordinates): N32 0.559' W99 38.4150'

Subject: Pool of fluids upstream the pond Part 1 (upstream Ned Creek)



Photo #9 . Facing south east from point of entry to Need Creek. Observed a tributary upstream to the pond containing produce water (salt water). TSS concentration was 6500 ppm.



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Creed Operating Facility Co., LLC Photo 10

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 10:40 am
City/County/State: Coleman County, Texas		
Location (coordinates):): N32 0.559' W99 38. 4150'		
Subject: Pool of fluids upstream the pond Part 2 (upstream Ned Creek)		



Photo #10. Facing south east from point of entry to Need Creek. Observed a tributary upstream to the pond containing produce water (salt water). TSS concentration was 6500 ppm.



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Creed Operating Facility Co., LLC Photo 11

Inspectors: Jack Arias & Dale Selgrath	Date: 11-29-12	Time: 11:00 am
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City/County/State: Coleman County, Texas
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Location (coordinates): N32 0.559' W99 38.4150'

Subject: TSS measurement in pond (upstream Ned Creek)



Photo #11. Facing south east from point of entry to Need Creek. TSS measurement of standing fluids was 6500 ppm TSS. Did not observe microorganism in pool of water. Pool in tributary discharge directly in pond and eventually in Ned Creek.



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Creed Operating Facility Co., LLC Photo 12


Inspectors: Jack Arias & Dale Selgrath	Date: 11-29-12	Time: 11:30 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.4050' W99 38.3411'		
Subject: Novice Unit Lease Tanks 8022 RRC 10904 (upstream Ned Creek) (tank 2)		
		

Photo #12. Facing south east from point of entry to Need Creek. Observed storage tanks containing fluids (oil and brine). Pipes placed improperly on the ground. Berms are inappropriate to contain overflow of fluids in case of emergency or technical failure.



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Creed Operating Facility Co., LLC Photo 13

Inspectors: Jack Arias & Dale Selgrath	Date:12-29-12	Time: 11:50 am
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.4236' W99 38.4252'		
Subject: Flow path of discharge of fluids coming from Tanks 8022 RRC 10904 Part 1		



Photo #13. Facing south east from point of entry to Need Creek. Observed a discharge flow path going directly into the tributary, discharging in pond and eventually in Ned Creek. Observed dead vegetation and small formations of salt crystals.



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Creed Operating Facility Co., LLC Photo 14

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 12:00 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.4236' W99 38.4252'		
Subject: Flow path of discharge of fluids coming from Tanks 8022 RRC 10904 Part 2		



Photo #14. Facing south east from point of entry to Need Creek. Observed a discharge flow path went directly into the tributary (TSS 6500 ppm) , discharged in pond (TSS 5700) and eventually in Ned Creek (TSS 1100).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Creed Operating Facility Co., LLC Photo 15

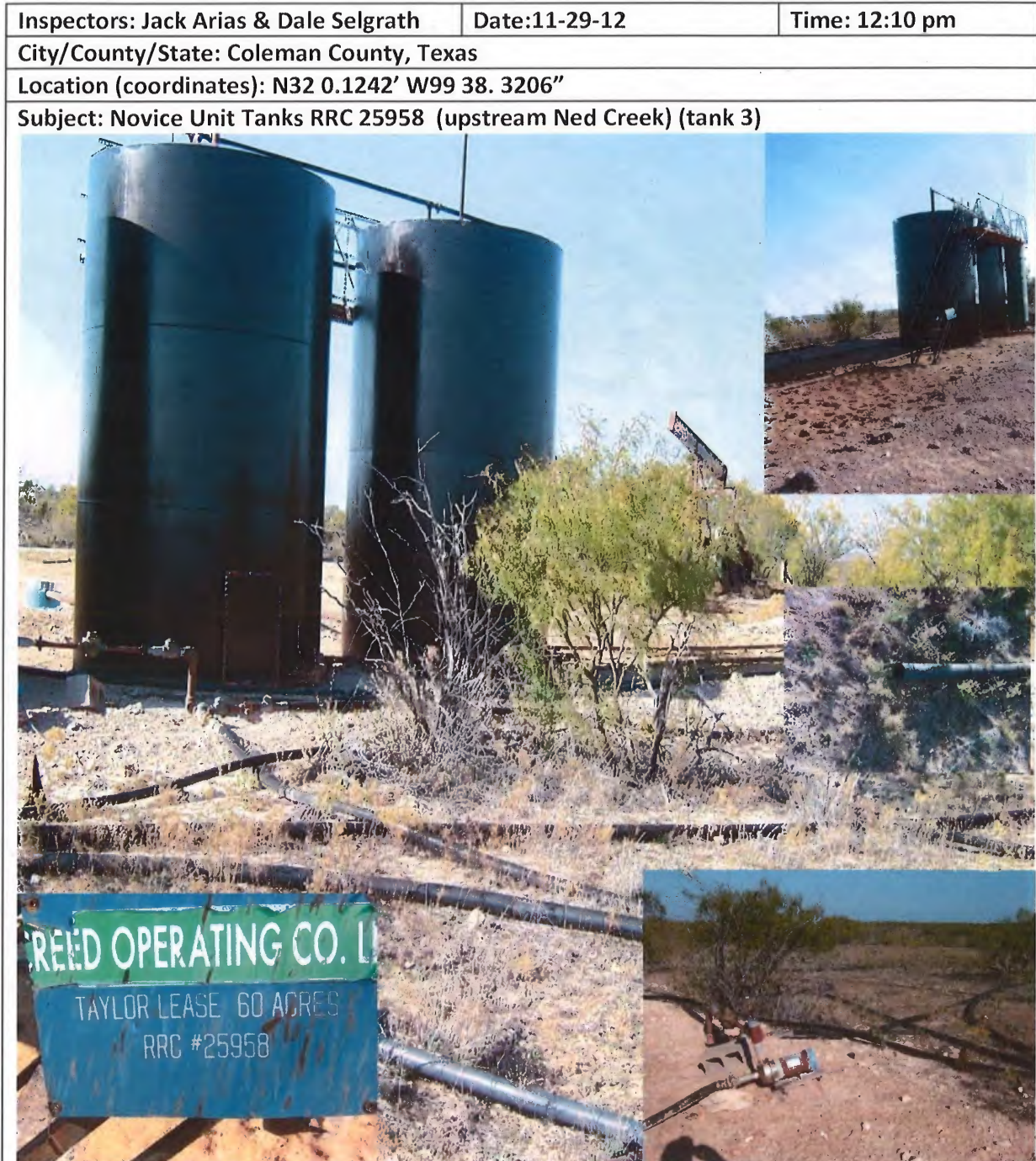


Photo #15. Facing south east from point of entry to Need Creek. Observed a discharge flow paths around tanks. Pipes placed improperly, there are not berms around tanks, and several pipes were open directly discharging in open areas and tributary.




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Creed Operating Facility Co., LLC Photo 16

Inspectors: Jack Arias & Dale Selgrath	Date: 11-29-12	Time: 12:40 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.1698' W99 38.2056'		
Subject: Pool in tributary contaminated with produce water (upstream Ned Creek)		
		
<p>Photo #16. Facing south east from point of entry to Need Creek and east from train rail. TSS measurement of standing fluids was 5700 ppm TSS. Did not observe microorganism in pool of water. Water in tributary discharge directly into Ned Creek.</p>		



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Creed Operating Facility Co., LLC Photo 17

Inspectors: Jack Arias & Dale Selgrath	Date: 11-29-12	Time: 12:55 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.1573' W99 38.1848'		
Subject: Pond contaminated with produce water (upstream Ned Creek)		
		
<p>Photo #17. Facing south east from point of entry to Need Creek and east from train rail. TSS measurement of standing fluids was 3600 ppm TSS. Did not observe microorganism in pool of water. Water in pond discharge directly into the tributary and eventually in Ned Creek.</p>		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Creed Operating Facility Co., LLC Photo 18

Inspectors: Jack Arias & Dale Selgrath

Date:11-29-12

Time: 1:00 pm

City/County/State: Coleman County, Texas

Location (coordinates): N32 0.9264' W99°4457'

Subject: Pool contaminated with produce water (upstream Ned Creek)



Photo #18. Facing south east from point of entry to Need Creek and east from train rail. TSS measurement of standing fluids was 13300 ppm TSS. Did not observe microorganism in pool of water. Water in tributary discharge directly into the pond and eventually in Ned Creek.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Dallas, Texas 75202-2733

Creed Operating Facility Co., LLC Photo 19


Inspectors: Jack Arias & Dale Selgrath	Date: 12-29-12	Time: 1:30 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.0106' W99 38.1425'		
Subject: Pool contaminated with produce water (upstream Ned Creek)		
		

Photo #19. Facing south east from point of entry to Need Creek and east from train rail. TSS measurement of standing fluids was 15100 ppm TSS. Did not observe microorganism in pool of water. Water in tributary discharge directly into the pond and eventually in Ned Creek.



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Creed Operating Facility Co., LLC Photo 20

Inspectors: Jack Arias & Dale Selgrath	Date:12-29-12	Time: 1:50 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N31 59.9691' W99 38.0109		
Subject: Flow path of discharge and improper placed of pipes coming from tanks (tank 4)		



Photo #20. Facing south east from point of entry to Need Creek and east from train rail. Observed a discharge flow paths around pipes connected to tanks (north of pies). Pipes placed improperly, open pipes discharging in open areas and tributary.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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1445 Ross Avenue, Suite 1200
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Creed Operating Facility Co., LLC Photo 21

Inspectors: Jack Arias & Dale Selgrath	Date:12-29-12	Time: 2:40 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.9264' W99 38.4457'		
Subject: Exposed Pipes with Discharge Valves in Tributary		



Photo #21. Facing south east from point of entry to Need Creek and east from train rail. Observed a large discharge flow paths around exposed pipes. Flow path connect directly with tributary and eventually to Ned Creek. Pipes and valves placed improperly.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Creed Operating Facility Co., LLC Photo 20

Inspectors: Jack Arias & Dale Selgrath

Date: 11-29-12

Time: 3:10 pm

City/County/State: Coleman County, Texas

Location (coordinates): N32 0.9264' W99°4457'

Subject: Discharge Point of Entry (Ned Creek) / Downstream



Photo #18. Facing north from tributaries and tanks. TSS measurement of standing fluids in Ned Creek was 1100 ppm TSS. Observed flow path of old discharges going to the creek. Also dead vegetation and some formations of salt crystal.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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Creed Operating Facility Co., LLC Photo 19

Inspectors: Jack Arias & Dale Selgrath	Date: 12-29-12	Time: 3:50 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32 0.8792' W99 38.4723'		
Subject: Ned Creek Upstream (Background level)		



Photo #19. Facing south west from point of entry. TSS measurement of standing fluids in Ned Creek was 500 ppm TSS. Observed organism, fish, and vegetation.



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Creed Operating Facility Co., LLC Photo 19

Inspectors: Jack Arias & Dale Selgrath	Date:11-29-12	Time: 4:10 pm
City/County/State: Coleman County, Texas		
Location (coordinates): N32°00'19" W99°39'13"		
Subject: Tayler Lake (Background level/Upstream Ned Creek)		



Photo #19. Facing south west from point of entry. TSS measurement of standing fluids in Taylor Creek was 100 ppm TSS. Observed organism, fish, and vegetation. Water from lake discharge directly into Ned Creek.